



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
ENVIRONMENTAL FIELD OFFICE**

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September 10, 2012

Mr. Victor Lay  
City of Spring Hill  
P.O. Box 789  
199 Town Center Parkway  
Spring Hill, TN 37174

**Re: Compliance Evaluation Inspection (CEI) Report**  
Small Municipal Separate Storm Sewer System (MS4) – Phase II  
NPDES Permit Number TNS080055

Dear Mr. Lay:

On September 5, 2012, I performed a Compliance Evaluation Inspection (CEI) of the storm water program of the City of Spring Hill. I met with Steven Warf during the inspection. The purpose of the inspection was to evaluate the program's compliance with the terms and conditions of the NPDES MS4 Phase II Permit TNS080055.

The Division conducted this CEI by evaluating each element of the six minimum control measures that are included in your storm water management program. Below is an outline of their findings:

**Permit**

NPDES Permit Number TNS080055 became effective on April 8, 2011, and it will expire on September 1, 2015.

**Minimum Control Measure 1 – Public Education and Outreach**

Spring Hill has developed and implemented a Public Information and Education Plan. The City is involved in several venues to reach the public and continues to implement programs including household hazardous waste collection, stream cleanups, tree plantings, etc. They provide information to the public through flyers,

radio announcements and their website. The City has provided appropriate training to employees to prepare them for their job functions.

The program needs to improve the way its public education and outreach is being documented and measured. The program should keep more specific records of the actions and activities it is doing to comply with this minimum control measure.

#### **Minimum Control Measure 2 -Public Participation and Involvement**

Spring Hill has complied with all public notice requirements. The City also partners with the Tennessee Environmental Council to hold regular stormwater related volunteer activities. Volunteer groups have included Boy Scouts, Girl Scouts and church groups. The City also has a Storm Water Advisory Committee.

#### **Minimum Control Measure 3- Illicit Discharge Detection and Elimination**

Spring Hill has mapped their system and continues to update their mapping as new outfalls are added or found. The City is proactive in their illicit discharge detection and elimination program to improve water quality within the MS4 program area by addressing complaints and field reconnaissance. All reported illicit discharges in the last year were handled appropriately by the program.

#### **Minimum Control Measure-4 Construction Site Runoff Control Program**

The City has completed an updated ordinance that is awaiting final review and approval. The new ordinance will bring it into compliance with the State's current construction permit. All active construction sites are inspected monthly and all employees have had TNEPSC Level I & II training. The City utilizes a consulting engineer to perform its SWPPP review.

#### **Minimum Control Measure-5 Permanent Stormwater Controls**

Spring Hill is making sure that post-construction controls are in place that will prevent or minimize water quality impacts. The City has also adopted ordinances and other regulatory mechanisms to address post-construction runoff ensuring adequate long-term operation and maintenance of BMPs appropriate for the community.

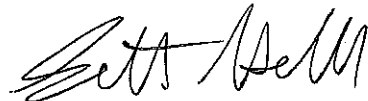
#### **Minimum Control Measure-6 Pollution Prevention and Good Housekeeping for Municipal Operations**

Spring Hill has procedures in place for properly disposing of waste removed from its separate storm sewers. Currently, the City performs street sweeping quarterly. The program has developed SWPPP's for all the various city facilities. City employees have been properly trained with regard to storm water concerns and the City has considered all required factors when developing their program.

We recognize that many steps have been taken by the City of Spring Hill to comply with the NPDES permit for small MS4's. You have adopted many ordinances and regulations that will improve the quality of stormwater runoff. Furthermore, you have taken a proactive approach in protecting the streams and waterways of Tennessee.

The Division would like to thank Mr. Steven Warf for his time and assistance during our inspection. Please feel free to contact me should you need additional assistance. If you have any questions concerning either our inspection or this report, please contact me at (931) 560-1303.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Howell", written in a cursive style.

Scott Howell  
Environmental Specialist  
Division of Water Resources